

Lolita De Palma

From: Talia Cohen
Sent: Thursday, September 1, 2022 11:54 AM
To: Lolita De Palma
Subject: Fwd: Defendant's Motion to Reschedule

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From: Kaveh Afrasiabi
Sent: Thursday, September 1, 2022 11:51:15 AM
To: Talia Cohen <Talia_Magnas@nyed.uscourts.gov>; Richardson Ian (USANYE) 1 <ian.richardson@usdoj.gov>; Winik Sara (USANYE) <sara.winik@usdoj.gov>; Vondornum, Deirdre (FD) <Deirdre_Vondornum@fd.org>
Subject: Defendant's Motion to Reschedule

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Dear Clerk:

I, Kaveh L. Afrasiabi, Pro Se, hereby requests from the court a one-week postponement of the status hearing, scheduled on September 7, 2022. As grounds for this Motion, the defendant states the following:

1. Defendant and the Prosecution have been involved in an intense plea negotiation and despite solid progress, unfortunately there are still areas of disagreement that require further negotiation.
2. Defendant has been recently plagued with multiple medical problems, ranging from excruciating gout flare to a yet to be fully diagnosed abdominal pain depriving the defendant of nightly sleep. Defendant is scheduled to take an MRI with respect to a recently-discovered cyst in the stomach and this test has been repeatedly postponed due to medical concerns over the potential damage to the defendant's malfunctioning kidneys.
3. A one-week postponement is necessary in order to prevent a rash decision by either side and to allow sufficient time to hammer out the remaining differences. Such a brief postponement is in the interest of justice and judicial efficacy, in light of the cumbersome alternative of proceeding to trial.

Hence, defendant requests a one week delay in the scheduled hearing.

Respectfully Submitted,

Kaveh L. Afrasiabi, Pro Se

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